Rainier Commons LLC
Semiannual Report on Compliance with Best Management Practices for the Control of PCB-Bearing Solids

Reporting Period: July 1, 2019 through December 31, 2019

Rainier Commons, in accordance with the reporting requirements of King County Wastewater Discharge Permit # 7927-01, is pleased to submit the following report. This report is intended to demonstrate compliance with the reporting requirements of Permit Section S3.F. Specific permit reporting requirements are re-stated below, in italics; followed by Rainier Commons' response.

1a. A summary of stormwater source control BMP activities conducted during the reporting period

Please see Attachment "A" (two pages) for a summary of Rainier Commons' source control BMP activities.

1b. A summary of any additional source control and sampling/monitoring activities conducted during the reporting period in response to requirements specified by the Environmental Protection Agency (EPA) in its December 18, 2013, conditional approval of Rainier Commons' Work Plan for Exterior paint removal dated March 25, 2013, and any subsequent EPA approvals related to individual Phased Work Plans related to site building exterior paint removal phases

In addition to the 12,150 square feet of exterior paint removal accomplished in Phase I, approved as complete by EPA on May 3, 2019, the EPA issued its approval of the Phase IIa work, as complete, on November 14, 2019. The Phase IIa work removed an additional 3,000 square feet of dried applied paint.

No additional EPA mandated sampling/monitoring activities were required during this reporting period. No additional abatement work was performed, however, the Phase IIb work plan has been pending EPA approval for an extended period of time and we are informed that it has moved to final legal review and that we should finally receive that approval in the next 30 days.

Rainier Commons has further prepared a draft of the Phase III Individual Work Plan. The Phase III IPWP will be finalized and submitted to EPA within the next 30 days. The Phase III work plan includes the balance of the work at the campus.

1c. An evaluation of how well the BMPs and/or pretreatment system functioned to minimize the discharge of PCBs into the sanitary sewer

As evidenced by on-going sampling and testing by both Rainier Commons and King County Industrial Waste Program personnel, our site source control activities continue to provide a high degree of protection and confidence in these actions.

1d. A report on any operations and maintenance training conducted for employees that work at the site for the benefit of performing BMP activities, maintaining compliance with the permit, and continuing minimization of PCB discharges

All Rainier Commons personnel involved with any work involving the handling of materials potentially containing PCBs are re-trained annually and carry current "HAZWOPER" certifications. In addition, cite source control work is periodically inspected for thoroughness. The need for completeness and care is verbally reiterated during in-person supervisory interactions on a regular basis.

1e. A summary of all PCB results (self-monitoring and KCIW monitoring) that are greater than the screening limit of 0.1µg/L for that time period and corrective actions taken

On December 19th Rainier Commons received a Notice of Violation (NOV) from King County Industrial Waste (KCIW) stating that sample site IW1056A (M/H #6) exceeded the Method Detection Limit of 0.1 ug/L, which was established as a conservative administrative action level to highlight any possible irregularities with our BMP controls. Testing results identified PCB levels of 0.358 ug/L (Aroclor 1254) and 0.14 ug/L (Aroclor 1260) which exceed the established administrative limit.

Upon receipt of the NOV, Rainier personnel promptly conducted a thorough field inspection to verify all BMP controls were in place and functioning properly. Once satisfied, Rainier collected a follow-up grab sample from site IW1056A on December 20th. There was a significant rain event that date, providing sufficient aqueous content for sample gathering. The sample was sent to Fremont Analytical Lab for testing. Test results were received on December 30th. Sampling test results indicate "Non Detect" for PCBs (copy of test results attached).

In summary, the screening limit established as an action level to trigger a review of our BMPs for efficacy worked as planned. The KCIW sampling results triggered a review of our practices, and subsequent sampling confirmed that our BMPs are effective at preventing PCBs from entering the combined storm/sewer system.

Notwithstanding the above, Rainier Commons continues to pursue even further reductions in PCBs detected in the stormwater passing through our facility. Our 2020 Capital Improvement Plan includes the complete replacement of several roofing membranes on the campus. Some of the roofs subject to replacement are flat roofs with several low spots, where rainwater collects during rain events. As roof drain filters start to show signs of diminished capacity during a rain event, they are changed out for new filters – during some storms roof drain filters are changed out several times during the course of a day, due to particulate loading. For example, heavy pollen and other debris can load the filter fabric, causing water to back up on the roof. During filter change-out, water backup collected in the roof low spots can flow down roof drains, without receiving additional filtration. Part of the goal of our roof replacement project will be to correct and minimize these low spots, helping to reduce water pooling during storm events, thereby providing continuous rain water filtration at the roof drains, before the rain becomes storm runoff.

Should any additional information be required, please contact the undersigned at (b) (6) or (b) (6)

Sincerely:

Doug Lansing
Project Manager
Rainier Commons LLC

Attachment A

RAINIER COMMONS SOURCE CONTROL "CONTAINMENT PLAN"

Ongoing Maintenance:

It has been our ongoing practice to collect any and all loose paint chips from the exterior horizontal surfaces of the property. Prior to performing such work, all personnel must wear protective clothing and gear, including but not limited to ; glove, mask and/or any other equipment and attire required and deemed necessary by WISHA/L&I and/or EPA. All waste collected is stored in regulated containers, properly documented, characterized, tested, and transported and disposed of by qualified environmental firms.

Cleaning of Planting Strips and Roof Surfaces:

On an ongoing basis; designated and trained personnel inspect, hand pick, and vacuum (using HEPA filtered equipment) and paint chips that have fallen to the ground or roof surfaces. All material collected is documented and disposed of in designated and labeled PCB containing waste containers per EPA 40C.F.R. regulations.

Filter Socks on Roof Drains and Catch Basin Drains:

In conjunction with the above described work, a weekly inspection of all roof drains and catch basins is conducted. All such drains have been previously fitted and equipped with a filter fabric media so as to filter out debris and contaminates. During the weekly inspection; if deemed necessary and the debris has reached an appreciable quantity with the filter fabric; the worker will remove the drain grate, clean around the grate, and dispose of the debris and filter fabric in the same manner as described above. The worker then re-fits the drain with either "Fiberweb Typar" Geo-Textile drain fabric, "Ultra Tech" Ultra-DrainGuard catch basin filters or a similar product. Once the fabric filter and debris have been removed and disposed of, Clean Harbors is notified for debris transport and disposal based on the current "profile" in place for such materials. Profile results are forwarded to the EPA, in connection with exterior work plan documents and reports.

Cleaning of Parking Lot and Walkway Surfaces:

On a consistent weekly basis McDonough and Sons, Inc. Sweeping Services power sweeps and vacuums the Rainier Commons parking lots and walkway surfaces reachable by vacuum truck. Debris from each sweeping is disposed of in a locked and properly labeled transportation container located on the west side of the property. Clean Harbors periodically collects representative samples of materials inside the transportation boxes. Once collected, these samples are transported to an independent laboratory for testing. Results are forwarded to the EPA, in connection with exterior work plan documents and reports.

Catch Basin Sediment Removal:

Generally on a quarterly basis, Rainier Commons removes sediment from its catch basins. The catch basin filter socks are removed and replaces as described above. During this cycle, if sediments are observed to be accumulating in the bottom of the catch basins the sediment is removed through the use of hand tools and suction via Hepa-filtered shop vacuums. The sediment is then placed in the locked box in the designated and signed hazardous material storage area, for characterization and proper disposal.

Attachment A

Enhanced Site Source Control Actions

Calendar Year 2019

As a continuation of our enhanced site source control program, which began September 15, 2014, a two-man crew will continue to perform control activities, including:

- Multiple rounds of cleaning and vacuuming on the roofs of Buildings 24, 1, 2, 3, 26, 5A, 22, 25, 6, 7, 18, 9, 14, and 15.
- Install/replace roof drain filters on all roofs cleaned, as needed, based on frequency and severity of rain events
- Ongoing change-out of roof filters, daily, during rain events
- Multiple cycles of hand vacuuming the parking lot and courtyard with HEPA-filter vacuums
- Catch Basins cleaned of sediments, as needed, on a quarterly basis
- Hand removal and disposal of flaking paint from exterior walls to prevent introduction of PCBs into the storm water system
- Monthly change-out of HEPA filters used during Control activities

These enhanced activities, in conjunction with our other on-going maintenance activities, continue to provide for a very effective system of controls for PCB-laden paint, as evidenced by our catch basin sampling results.